REMARKS

This Amendment is responsive to the Final Office Action dated August 20, 2007. A Request for Continued Examination (RCE) is filed herewith. All rejections and objections of the Examiner are respectfully traversed. Reconsideration and further examination are respectfully requested.

The amendments to the claims herein are supported at various places in the Specification as originally filed. For example, lines 2-5 on page 10 state that "While pressing the enter key may be the keyboard operation detected by the disclosed system to select a current button, other keyboard operations may be used in the alternative, such as detection of the user pressing a key other than the enter key." Further for example, on page 14 lines 18-23 state that "The statement event.cancelBubble=true 208 sets a flag in the event object indicating that further processing of the keyboard event should not be performed, and the statement event.returnValue=false 210 provides indication that the event has been handled, thus preventing an actual carriage return from being performed." Further for example, the "Bold" parameter is passed to both "javascript:simple" and "javascript:simpleKey" functions as shown in Fig. 3, thus indicating which text formatting command is to be performed.

At paragraph 3 of the Office Action, the Examiner objected to claims 3, 10 and 17 for depending on canceled claims. Amendments to the claims herein are respectfully believed to satisfy all requirements of the Examiner in this regard.

At paragraphs 4-13 of the Office Action, the Examiner has again rejected the present claims for obviousness under 35 U.S.C. 103, citing the combination of "Using JavaScript to Create a Powerful GUI" of Hourihan ("Hourihan"), W3C 4.01 Specification ("W3C"), and

"Creating a Modal Dialog Box" of Shiran ("Shiran"). Applicants respectfully traverse this rejection.

As noted in the previous response, Hourihan discloses an HTML code segment that creates a button using an <img> tag. The <img> button of the Hourihan article is mouse-operable only, and Hourihan includes no hint or suggestion of even the desirability of providing keypress operability of the button in the Hourihan HTML example. W3C discloses that the tabindex attribute was available for form HTML elements, listed on page 19 as the A, AREA, BUTTON, INPUT, OBJECT, SELECT, and TEXTAREA elements. W3C further discloses that the "enter" key may be used to activate a selected one of those listed HTML elements. Shiran discloses that Internet Explorer allows the creation of modal dialog boxes.

Nowhere in the combination of Hourihan, W3C and Shiran is there disclosed or suggested any system or method for creating at least one accessible graphical image within a modal dialog box graphical object, comprising:

> providing said modal dialog box graphical object;
> providing said at least one accessible graphical image within said modal dialog box graphical object, wherein said providing said at least one accessible graphical image is responsive to at least one image command, said image command including
> a first attribute determining the processing of at least one predetermined keyboard event, wherein said first attribute is an event handler attribute that invokes a keyboard event event handler, ***wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that a predetermined key other than the enter key was pressed, and, in the event that said event object value matches said predetermined value, invoking a software routine operable to perform a predetermined function associated with said accessible graphical image, and preventing further processing of the keyboard event***,
> a second attribute determining the processing of mouse click events, wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, wherein said first attribute and said second attribute both pass the same parameter to said software routine operable to perform said predetermined function associated with said accessible graphical image, ***such that said software routine operable***

to perform said predetermined function associated with said accessible graphical image operates the same in response to a user pressing said predetermined key other than the enter key and in response to said user performing a mouse click, and

a third attribute having a parameter indicating an ordinal value to be associated with said at least one graphical image, wherein said ordinal value represents a relative position within an ordering of graphical images within said modal dialog box graphical object, whereby a user is allowed to access said at least one graphical image by using a keyboard action resulting in ones of said graphical images within said modal dialog box being sequentially accessed responsive to said ordering of graphical images within said modal dialog box; and

wherein said at least one accessible graphical image comprises a plurality of accessible graphical images, wherein each of said accessible graphical images is associated with a respective one of a plurality of text formatting operations, ***wherein said software routine operable to perform said predetermined function is further operable to perform each of said plurality of text formatting operations, and wherein said parameter passed by both said first attribute and said second attribute to said software routine operable to perform said predetermined function associated with said accessible graphical image uniquely identifies said predetermined function associated with said accessible graphical image among said plurality of text formatting operations.*** (emphasis added)

as in the present independent claim 1. In contrast, a user pressing the *enter* key in the combined references is described as resulting in element activation for the elements listed in section 17.11.1 of W3C (A, AREA, BUTTON, INPUT, OBJECT, SELECT, and TEXTAREA). None of these elements includes the capability of being activated through pressing of a key other than the enter key, as in the present independent claim 1. Moreover, as previously explained, these listed elements expressly do not include the <img> tag, as also set forth in the present independent claim 1. Accordingly, the combined references do not include any hint or suggestion of handling keyboard events using a keyboard event event handler in an <img> tag that is tab indexed, far less any teaching regarding processing a keyboard event using a keyboard event event handler in an <img> element that checks the pressed key to determine whether a predetermined key other than the "enter" key was pressed, and that operates in the case where the pressed key was the predetermined key other than the "enter" key to call the same function with

the same parameter as is called directly for a mouse click event as defined in the same <img> element. Such processing is not disclosed or suggested in either the form elements of 17.11.1 in W3C, the <img> buttons of Hourihan, or the modal dialog box creation of Shiran. Moreover, nowhere in the combined references is there disclosed or suggested a software routine operable to perform a plurality of text formatting operations, and wherein a parameter passed by both a first attribute and said second attribute of the element to the software routine that uniquely identifies a predetermined function associated with the accessible graphical image among the plurality of text formatting operations, as in the present claim 1.

For the above reasons, Applicants respectfully urge that the combination of Hourihan, W3C and Shiran does not disclose or suggest all the features of the present independent claim 1. The combination of Hourihan, W3C and Shiran therefore does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the present independent claim 1.

Independent claim 8 also stands rejected based on the combination of Hourihan, W3C and Shiran. Claim 8 sets forth a computer program product, wherein said computer program product includes a computer readable medium, said computer readable medium having a computer program for creating at least one accessible graphical image within a modal dialog box graphical object stored thereon, said computer program comprising:

> program code for providing said modal dialog box graphical object;
> program code for providing said at least one accessible graphical image within said modal dialog box graphical object, wherein said providing said at least one accessible graphical image is responsive to at least one image command, said image command including
> a first attribute determining the processing of at least one predetermined keyboard event, wherein said first attribute is an event handler attribute that invokes a keyboard event event handler, ***wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that a predetermined key other than the enter key was pressed, and, in***

> ***the event that said event object value matches said predetermined value, invoking a software routine operable to perform a predetermined function associated with said accessible graphical image and preventing further processing of the keyboard event***,
>
> a second attribute determining the processing of mouse click events, wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, wherein said first attribute and said second attribute both pass the same parameter to said software routine operable to perform said predetermined function associated with said accessible graphical image, ***such that said software routine operable to perform said predetermined function associated with said accessible graphical image operates the same in response to a user pressing said predetermined key other than the enter key and in response to said user performing a mouse click***, and
>
> a third attribute having a parameter indicating an ordinal value to be associated with said at least one graphical image, wherein said ordinal value represents a relative position within an ordering of graphical images within said modal dialog box graphical object, whereby a user is allowed to access said at least one graphical image by using a keyboard action resulting in ones of said graphical images within said modal dialog box being sequentially accessed responsive to said ordering of graphical images within said modal dialog box; and
>
> wherein said at least one accessible graphical image comprises a plurality of accessible graphical images, wherein each of said accessible graphical images is associated with a respective one of a plurality of text formatting operations, ***wherein said software routine operable to perform said predetermined function is further operable to perform each of said plurality of text formatting operations, and wherein said parameter passed by both said first attribute and said second attribute to said software routine operable to perform said predetermined function associated with said accessible graphical image uniquely identifies said predetermined function associated with said accessible graphical image among said plurality of text formatting operations.*** (emphasis added)

For reasons that should be clear from the discussion of Hourihan, W3C and Shiran set forth above, the combination of Hourihan, W3C and Shiran does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the computer program product of claim 8, including the claimed processing of a keyboard event using a keyboard event event handler in an <img> element that checks the pressed key to determine whether a predetermined key other than the "enter" key was pressed, and that operates in the case where the pressed key was the predetermined key other than the "enter" key to call the same function with the same parameter

as is called directly for a mouse click event as defined in the same <img> element, and that also prevents the keyboard event from being further processed, and the software routine operable to perform a plurality of text formatting operations, wherein a parameter passed by both a first attribute and said second attribute of the element to the software routine that uniquely identifies a predetermined function associated with the accessible graphical image among the plurality of text formatting operations.

In view of the foregoing, claim 8 patentably distinguishes over the combination Hourihan, W3C and Shiran. Applicants respectfully request that the rejection of claim 8 under 35 U.S.C. 103 based on the combination of Hourihan, W3C and Shiran be withdrawn.

Independent claim 15 also stands rejected based on the combination of Hourihan, W3C and Shiran. Claim 15 sets forth a system for creating at least one accessible graphical image within a modal dialog box graphical object, comprising:

> means for providing said modal dialog box graphical object;
> means for providing said at least one accessible graphical image within said modal dialog box graphical object, wherein said providing said at least one accessible graphical image is responsive to at least one image command, said image command including
> a first attribute determining the processing of at least one predetermined keyboard event, wherein said first attribute is an event handler attribute that invokes a keyboard event event handler, ***wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that a predetermined key other than the enter key was pressed, and, in the event that said event object value matches said predetermined value, invoking a software routine operable to perform a predetermined function associated with said accessible graphical image and preventing further processing of the keyboard event,***
> a second attribute determining the processing of mouse click events, wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, wherein said first attribute and said second attribute both pass the same parameter to said software routine operable to perform said predetermined function associated with said accessible graphical image, ***such that said software routine operable to perform said predetermined function associated with said accessible graphical image***

operates the same in response to a user pressing said predetermined key other than the enter key and in response to said user performing a mouse click, and

a third attribute having a parameter indicating an ordinal value to be associated with said at least one graphical image, wherein said ordinal value represents a relative position within an ordering of graphical images within said modal dialog box graphical object, whereby a user is allowed to access said at least one graphical image by using a keyboard action resulting in ones of said graphical images within said modal dialog box being sequentially accessed responsive to said ordering of graphical images within said modal dialog box; and

wherein said at least one accessible graphical image comprises a plurality of accessible graphical images, ***wherein each of said accessible graphical images is associated with a respective one of a plurality of text formatting operations, wherein said software routine operable to perform said predetermined function is further operable to perform each of said plurality of text formatting operations, and wherein said parameter passed by both said first attribute and said second attribute to said software routine operable to perform said predetermined function associated with said accessible graphical image uniquely identifies said predetermined function associated with said accessible graphical image among said plurality of text formatting operations.*** (emphasis added)

For reasons that should be clear from the discussion of Hourihan, W3C and Shiran set forth above, the combination of Hourihan, W3C and Shiran does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the system of claim 15, including the claimed processing of a keyboard event using a keyboard event event handler in an <img> element that checks the pressed key to determine whether a predetermined key other than the "enter" key was pressed, and that operates in the case where the pressed key was the predetermined key other than the "enter" key to call the same function with the same parameter as is called directly for a mouse click event as defined in the same <img> element, and that also prevents the keyboard event from being further processed, and the software routine operable to perform a plurality of text formatting operations, wherein a parameter passed by both a first attribute and said second attribute of the element to the software routine that uniquely identifies a predetermined function associated with the accessible graphical image among the plurality of text formatting operations.

In view of the foregoing, claim 15 patentably distinguishes over the combination Hourihan, W3C and Shiran. Applicants respectfully request that the rejection of claim 15 under 35 U.S.C. 103 based on the combination of Hourihan, W3C and Shiran be withdrawn.

Independent claim 22 also stands rejected based on the combination of Hourihan, W3C and Shiran. Claim 22 sets forth a system for creating at least one accessible graphical image within a modal dialog box graphical object, comprising:

> program code, stored in a computer readable memory of a computer having at least one processor having access to said memory, for providing said modal dialog box graphical object;
>
> program code, stored in said memory, for providing said at least one accessible graphical image within said modal dialog box graphical object, wherein said providing said at least one accessible graphical image is responsive to at least one image command, said image command including
>
> a first attribute determining the processing of at least one predetermined keyboard event, wherein said first attribute is an event handler attribute that invokes a keyboard event event handler, ***wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that a key other than the enter key was pressed, and, in the event that said event object value matches said predetermined value, invoking a software routine operable to perform a predetermined function associated with said accessible graphical image and preventing further processing of the keyboard event,***
>
> a second attribute determining the processing of mouse click events, wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, wherein both said first attribute and said second attribute pass the same parameter to said software routine operable to perform said predetermined function associated with said accessible graphical image, ***such that said software routine operable to perform said predetermined function associated with said accessible graphical image operates the same in response to a user pressing said predetermined key other than the enter key and in response to said user performing a mouse click***, and
>
> a third attribute having a parameter indicating an ordinal value to be associated with said at least one graphical image, wherein said ordinal value represents a relative position within an ordering of graphical images within said modal dialog box graphical object, whereby a user is allowed to access said at least one graphical image by using a keyboard action resulting in ones of said graphical images within said modal dialog box being sequentially accessed responsive to said ordering of graphical images within said modal dialog box; and
>
> wherein said at least one accessible graphical image comprises a plurality of accessible graphical images, ***wherein each of said accessible graphical images is***

associated with a respective one of a plurality of text formatting operations, wherein said software routine operable to perform said predetermined function is further operable to perform each of said plurality of text formatting operations, and wherein said parameter passed by both said first attribute and said second attribute to said software routine operable to perform said predetermined function associated with said accessible graphical image uniquely identifies said predetermined function associated with said accessible graphical image among said plurality of text formatting operations (emphasis added)

For reasons that should be clear from the discussion of Hourihan, W3C and Shiran set forth above, the combination of Hourihan, W3C and Shiran does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the system of claim 22, including the claimed processing of a keyboard event using a keyboard event event handler in an <img> element that checks the pressed key to determine whether a predetermined key other than the "enter" key was pressed, and that operates in the case where the pressed key was the predetermined key other than the "enter" key to call the same function with the same parameter as is called directly for a mouse click event as defined in the same <img> element, and that also prevents the keyboard event from being further processed, and the software routine operable to perform a plurality of text formatting operations, wherein a parameter passed by both a first attribute and said second attribute of the element to the software routine that uniquely identifies a predetermined function associated with the accessible graphical image among the plurality of text formatting operations.

In view of the foregoing, claim 22 patentably distinguishes over the combination Hourihan, W3C and Shiran. Applicants respectfully request that the rejection of claim 22 under 35 U.S.C. 103 based on the combination of Hourihan, W3C and Shiran be withdrawn.

As to the dependent claims, they each depend from one of the independent claims discussed above, and are respectfully believed to be patentable over the combination of Hourihan, W3C and Shiran for at least the same reasons.

Reconsideration of all pending claims is respectfully requested.

Applicants have amended the independent claims, but are not conceding in this application that the unamended claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of allowable subject matter. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Applicants' Attorney at the number listed below so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

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Date

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